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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

J.B.,

Plaintiff,

v.

LEVI GRAY, JAYSON LEAK, PAUL
KIZER, JOHN WALLACE, JAMIE
DENNISON, FELIPE URZUA-PEREZ,
STEPHEN MARTIN, THOMAS JOST,
ROBERT YONALLY, LISA ARRINGTON,
CHAD NAUGLE, NICOLE BROWN, MIKE
REESE, and JOHN DOE,

Defendants.

Case No. 3:23-cv-01962-AN

STIPULATED MOTION FOR EXTENSION
OF TIME

L.R. 7-1(a)(1) CERTIFICATE OF CONFERRAL

Counsels for the Plaintiff, Counsels for the State Defendants, as well as *pro se* Defendant

Levi Gray have conferred and stipulate to file this motion jointly.

MOTION

The Parties respectfully move this Court pursuant to Fed. R. Civ. P. 6 for an extension of time with respect to the current deadlines set in this case. Currently, the deadline to complete discovery is April 23, 2024 and the deadline to submit the Joint ADR Report and Pretrial Order is May 28, 2024. The parties propose an extension of those deadlines and the setting of others as follows:

- Close of Discovery December 6, 2024
- Expert Disclosures January 10, 2025
- Rebuttal Reports February 7, 2025
- Close of Expert Discovery March 7, 2025
- Dispositive Motions/Joint ADR Report April 4, 2025
- Trial Order to be filed following resolution of dispositive motions

The extension of time is necessary to complete discovery and attempt pre-trial resolution. The extension also contemplates AAG Matthew Maile's expected Paternity Leave to be taken between June 1 through August 31, 2024. This motion is not made for the purposes of unnecessary delay.

DATED April 19, 2024.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

s/ Matthew A. Maile
NATHAN K RIEMERSMA #164699
Senior Assistant Attorney General
Attorney for State Defendants

s/ Lynn S. Walsh
LYNN S. WALSH #164699
Of Attorney for Plaintiff

s/ Levi Gray
LEVI GRAY
Pro Se Defendant

CERTIFICATE OF SERVICE

I certify that on April 19, 2024, I served the foregoing STIPULATED MOTION FOR EXTENSION OF TIME upon the parties hereto by the method indicated below, and addressed to the following:

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s/ Matthew A. Maile

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